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Water and Pollution Control Department

Office of the Director

City of Kansas City, Missouri
Heart of America

5th Floor, City Hall
Kansas City, Missouri 64106

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February 26, 1993

Mr. Doron Fertig
Federal Communications Commission
1919 M Street
Washington, D.C. 20554

Re: PR Docket No. 92-235

Dear Mr. Fertig:

Attached you will find a review of your proposed Part 88 with comments on its effects to the Kansas City, Missouri Water & Pollution Control PLMR.

With one exception, we do not feel the changes will be of significant impact. We are, however, very concerned with the proposed reduction of ERP; and lowering of ERP for antennas above 197 feet above average grade.

Kansas City, Missouri is one of the largest cities in the United States in area at approximately 320 square miles. In view of this fact, our PLMR is licensed above 300 watts and antennas are above 197 feet in order to provide proper coverage over this large area.

In view of these facts, we would urge you to reconsider this proposed change on ERP and ERP above 197 feet as to minimize impacts on utilities such as ours.

Your cooperation in this matter is greatly appreciated.

Very truly yours,

Franklyn W. Pogge
Assistant Director

c: A. C. Kirkwood
Jean-Pol Mahieu

Enclosure

A.C. KIRKWOOD & ASSOCIATES

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A DIVISION OF
Shafer, Kline & Warren, P.A.
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AFFILIATE
Tuttle-Avers-Woodward Co.
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February 22, 1993

Water & Pollution Control Department
5th Floor, City Hall
414 E. 12th Street
Kansas City, Missouri 64106

Attention: Mr. Franklyn Pogge, P.E.
Assistant Director

Re: Review of FCC Proposal Part 88

Per our conversation, we have reviewed the FCC's Part 88 in regard to the Water Department's mobile radio system. The proposed FCC Part 88 basically is replacing Part 90. The proposal is based on the use of the narrowband technology, which will create more available frequencies. We offer the following concerns to the Notice based upon our knowledge of your Private land mobile radio (PLMR) system.

1. The effective radiated power (ERP) shall be reduced to 300 watts. Lower ERP limits will be set for systems with antenna heights 197 feet above average grade. This will reduce the physical area covered by a transmitter. This proposed change would require compliancy by January 1, 1996.

2. A new emission mask, a filter located within the transmitter, is being proposed. The mask is designed to provide 40 dB of attenuation at the edge of the authorized channel, 50 dB attenuation at the edge of the authorized bandwidth of the adjacent channel, and 65 dB of attenuation thereafter. This mask could possibly be achieved by realignment of the existing transmitter filter or the addition of retrofit filters.

3. The current 25 kHz bandwidth would be reduced to 12 bandwidth. Existing users would utilize 5 kHz equipment. Existing equipment would have to be retrofitted for this reduced bandwidth requirement. This proposed change would require compliancy by January 1, 1996.

We also offer the following possible "pluses" concerning the proposed FCC Part 88.

1. The FCC also proposes a channel exclusivity option in the bands above 150 MHz. If applied for and granted, this exclusive use overlay (EUO) would insure that no additional channel within 50 miles would be permitted without concurrence of the licensee.

2. The reduction of the bandwidth creates an additional two channels. The existing user could remain on one or two of the three channels created. If the existing PLMR system is crowded, it would be an ideal time to pick up another frequency.

If we may be of further assistance, please contact us.

A. C. KIRKWOOD & ASSOCIATES

Heidi Jo M. Stanfield

Heidi Jo M. Stanfield, E.I.T.

HMS/mt

cc: Mr. Jean Pol Mahieu